

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SHAHANAY ALVARES,**

**Plaintiff,**

**v.**

**BENJAMIN MCGINNIS,  
MOELLER TRUCKING, INC.,  
ARCH INSURANCE COMPANY,  
ARCH INSURANCE GROUP, INC.,  
and ARCH INSURANCE  
SOLUTIONS, INC.,**

**Defendants.**

**CIVIL ACTION FILE NO.**

**REMOVED FROM THE STATE  
COURT OF HENRY COUNTY,  
GEORGIA  
CIVIL ACTION FILE NO.  
STSV2023000587**

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**DECLARATION OF DAVID R. CARDUCCI**

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I, David R. Carducci, pursuant to 28 U.S.C. § 1746 and under penalty of perjury,  
hereby declare as follows:

1.

I am at least eighteen (18) years of age and give this Declaration of my own  
accord. I have personal knowledge of the facts stated herein.

2.

My name is David R. Carducci. I am an Associate Attorney with Hall Booth  
Smith, P.C.

3.

I am one of the attorneys at Hall Booth Smith, P.C., assigned to Shahaney Alvares's lawsuit against Benjamin McGinnis, Moeller Trucking, Inc., Arch Insurance Company, Arch Insurance Group, Inc., and Arch Insurance Solutions, Inc. (collectively, "Defendants"). Hall Booth Smith, P.C., represents all Defendants in this matter.

4.

Ms. Alvares is represented by Kenneth P. Raley, III, with Kaufman Law P.C.

5.

Ms. Alvares's Complaint in the State Court of Henry County, Georgia, CAFN STSV2023000587, was filed with the State Court on March 28, 2023.

6.

Ms. Alvares's Complaint alleges special damages, including \$28,917.18 in past medical expenses, as well as future medical expenses, lost wages, and other necessary expenses. Ms. Alvares's Complaint also alleges general damages, including mental and physical pain and suffering, personal inconvenience, loss of ability to labor, and inability to lead a normal life.

7.

In an email from Mr. Raley to me dated April 21, 2023, Mr. Raley made a demand on behalf of Ms. Alvares for full settlement of the above-captioned lawsuit in the amount of \$175,000.00.

8.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1<sup>st</sup> day of May, 2023.

/s/ David R. Carducci

DAVID R. CARDUCCI

Georgia Bar No. 477814

*Counsel for Defendants*